

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ROTHSCHILD LOCATION TECHNOLOGIES LLC,)	Civil Action
)	Lead Case No. 6:15-cv-00682-RWS-JDL
Plaintiff,)	
)	
v.)	
)	
GEOTAB USA, INC.,)	
)	
Defendant.)	
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ROTHSCHILD LOCATION TECHNOLOGIES LLC,)	No: 6:15-cv-00867-RWS-JDL
)	
)	
Plaintiff,)	
)	
v.)	
)	
LIFE360 Inc.,)	
)	
Defendant.)	
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**DEFENDANT LIFE360 INC.'S UNOPPOSED MOTION TO STAY ALL
DEADLINES PENDING RESOLUTION OF THE REPORT AND RECOMMENDATION**

Defendant Life360 Inc. ("Life360") respectfully requests that the Court stay this case and all forthcoming deadlines that apply to Life360 pending a decision by the Court as to whether to enter final judgment that the patent-in-suit is invalid. Plaintiff does not oppose this Motion.

On January 4, 2016, Magistrate Judge Love issued a Report and Recommendation (Dkt. No. 93) ("R&R") finding the claims of the patent-in-suit to be directed to unpatentable subject matter and determining those claims to be invalid for failure to comply with 35 U.S.C. § 101. Plaintiff has indicated it intends to file objections to the R&R and oppose entry of final judgment based thereon. Life360 requests this stay not for the purposes of any delay, but to avoid incurring legal expenses that may be unnecessary should final judgment of invalidity be entered based on

the R&R. For example, the Docket Control Order (Dkt. No. 87) and Discovery Order (Dkt. No. 81) require the exchange of initial disclosures and the submission of initial invalidity contentions, among other events, in the upcoming weeks.

Several other defendants in this consolidated case have previously sought stays pending resolution of the validity of the patent-in-suit (*see* Dkt. Nos. 95, 98) and the Court has granted those motions (*see* Dkt. Nos. 97, 99). In addition, Defendants Geotab USA, Inc., GoFleet Corp., and Iler Group, Inc. have moved for entry of final judgment based on the R&R (Dkt. 96).

For the reasons set forth above, Life360 respectfully requests that the Court stay all deadlines affecting Life360 until resolution of the validity of the patent-in-suit.

Respectfully submitted,

THE WEBB LAW FIRM

Dated: January 18, 2016

s/ Bryan P. Clark

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Counsel for Defendant Life360 Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of January, 2016, I electronically filed the foregoing
DEFENDANT LIFE360 INC.'S UNOPPOSED MOTION TO STAY ALL DEADLINES
PENDING RESOLUTION OF THE REPORT AND RECOMMENDATION with the Clerk
of Court using the CM/ECF system, which will send notification of such filing to all counsel of
record that have consented to electronic service.

s/ Bryan P. Clark
Bryan P. Clark

CERTIFICATE OF CONFERENCE

I hereby certify that, on the 15th day of January, 2016, counsel for Life360, Bryan Clark,
conferred via phone and email with counsel for Plaintiff, Neal Massand, and Plaintiff does not
oppose the filing of this Motion.

s/ Bryan P. Clark
Bryan P. Clark